

1 Martha G. Bronitsky
2 Chapter 13 Standing Trustee
3 Po Box 5004
4 Hayward, CA 94540
5 (510) 266 - 5580

6 Trustee for Debtor(s)

7
8 UNITED STATES BANKRUPTCY COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION

11 In re
12 Lauren J Massa-Lochridge

13 Chapter 13 Case No. 18-42193-RLE13

14 debtor(s)

15 **Trustee's Motion to Dismiss Chapter 13 Case for Unreasonable Delay that is Prejudicial to
16 Creditors; Declaration and Notice and Opportunity to Object**

17 TO DEBTOR(S) AND DEBTOR(S)' ATTORNEY OF RECORD:

18 Martha G. Bronitsky, Chapter 13 Standing Trustee, files this Motion to Dismiss pursuant to 11 U.S.C.

19 Section 1307(c)(1) upon the debtor(s)' unreasonable delay that is prejudicial to creditors.

20 1. failure to comply with General Order 34, by failing to file a declaration with proof of ongoing
21 mortgage payments.

22 TO AVOID DISMISSAL

23 Within 21 days of this notice, YOU MUST file and serve a motion to modify plan or file an
24 opposition/request for hearing detailing why the case should not be dismissed stating specific actions you
25 have taken or will take to resolve the issue.

26 You should contact your attorney immediately to advise you of your legal options.

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28 If you do not timely take action, YOUR CASE WILL BE DISMISSED WITHOUT
29 FURTHER NOTICE OR HEARING.

1 PURSUANT TO LOCAL BANKRUPTCY RULE 9014-1(b)(3)(A) NOTICE IS HEREBY GIVEN:
2 Any objection to the requested relief, or a request for hearing on the matter, must be filed and served upon
3 the initiating party with 21 days of the mailing of notice; any objection or request for hearing must be
4 accompanied by any declarations or memoranda of law any requesting party wishes to present in support of
5 its position; if there is no timely objection to the requested relief or a request for hearing, the court may
6 enter an order granting relief by default.

7 In the event of a timely objection or request for hearing, (either): the initiating party will give at
8 least seven days written notice of the hearing to the objecting or requesting party, and to any trustee or
9 committee appointed in the case; or the tentative hearing date, location, and time are "n/a".

10 I declare under penalty of perjury that the foregoing is true and correct.

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13 Date: October 29, 2018

/s/ Martha G. Bronitsky

14 Signature of Martha G. Bronitsky
Chapter 13 Standing Trustee

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have served a copy of the within and foregoing document on the debtor (s), counsel for debtor (s), and if applicable, the creditor, creditor representatives and the registered agent for the creditor by depositing it in the United States mail with first class postage attached thereto.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Lauren J Massa-Lochridge
1601 Beverly Pl
Berkeley, CA 94707

Nathan D Borris Atty
1380 A Street
Hayward, CA 94541

(Debtor(s))

(Counsel for Debtor)

Date: 10/29/2018

/s/ Susana Valdivia

Susana Valdivia